

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF TENNESSEE (AT KNOXVILLE)**

In re: ALR CONSTRUCTION, INC.

Case No. 24-30127-SHB

Debtor

Chapter 11

CASE MANAGEMENT SUMMARY

COMES NOW the Debtor, by and through counsel, and pursuant to the Order of the Court [Doc. 8] files this Case Management Summary.

The Debtor, ALR Construction, Inc., (hereinafter “the Debtor”) filed for Chapter 11 bankruptcy protection on January 25, 2024.

The Debtor operates a business with a single office location of 1228 Phillips Road, White Pine, TN 37890.

The Debtor is in the construction business.

The Debtor’s gross annual revenue for the period ending December 31, 2023 was \$1,473,194.00

At the time of filing, the Debtor employed five individuals. No wages are owed as of petition date.

Payroll and sales tax obligations. At the time of filing, the Debtor owes payroll tax obligations of approximately \$115,608.00 and pays no state sales tax.

The Debtor is a Tennessee corporation with ownership and management as follows:

<u>Insider</u>	<u>Ownership</u>	<u>Office Held</u>	<u>Salary/Benefits</u>
Raymond J. Graham, III	40% shareholder	Vice President	
Raymond J. Graham, IV	60% shareholder	President	

Insiders (and relatives of insiders): Mazie Graham is the spouse of Raymond Graham, IV. Stephen Tavares is the cousin and nephew of Messrs Graham, respectively.

The Debtor filed for bankruptcy due to burdensome expense of pending litigation.

Approximate amounts owed to creditors as of the filing of this bankruptcy:

Secured creditors:	\$214,277.98
Unsecured priority creditors:	\$115,608.02
Unsecured creditors:	\$1,304,269.96 ¹

The Debtor’s current and fixed assets consist of revenue from the Texas Roadhouse job and the Surgoinsville contract, two items of construction equipment (a

¹ \$945,947.00 consists of claims existing in pending litigation and an insurance claim based on workers comp audit.

skid-steer loader and an excavator), three trailers, and one pickup truck with an appraised value of \$178,500.00 (less \$98,750.00 approximately in debt), accounts receivable valued at \$157,500.00, building materials valued at \$32,200.00, tools valued at \$30,500.00, miscellaneous office equipment and furnishings, and exclusive rights to use and possession of office and shop space located at 1228 Phillips Road, White Pine, TN 37890 which rights can be assigned or rented through September 30, 2027.

Strategic objectives for plan confirmation. It is expected that the Debtor will file a Plan of Reorganization that proposes to collect accounts receivable and liquidate assets to pay administrative expenses and secured claims and distribute any remainder pro rata. At this time, there is no plan for the surrender of assets.

Any emergency relief to be requested by Debtor within 14 days after petition date. The Debtor seeks a court order on an expedited basis granting interim permission to use cash collateral.

DATE: 2/2/2024

RESPECTFULLY SUBMITTED,

MOORE & BROOKS

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